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19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 U.S. BANK NATIONAL ASSOCIATION,
28 SUCCESSOR IN INTEREST TO BANK OF
29 AMERICA, NATIONAL ASSOCIATION,
30 SUCCESSOR BY MERGER TO
31 LASSALLE BANK NATIONAL
32 ASSOCIATION AS TRUSTEE FOR
33 GSAMP TRUST 2007-NC1 MORTGAGE
34 PASS-THROUGH CERTIFICATES,
35 SERIES 2007-NC1

36 Plaintiff,

37 vs.

38 FIDELITY NATIONAL TITLE GROUP,
39 INC., et al.,

40 Defendants.

Case No.: 2:21-cv-00537-JCM-BNW

**STIPULATION AND
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 6] AND MOTION FOR FEES AND
COSTS [ECF No. 7]**

(First Request)



Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On April 1, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-832212-C [ECF No. 1-1];
2. On April 2, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On May 3, 2021, U.S. Bank filed a Motion for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7];
4. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion for Costs and Fees is May 17, 2021;
5. Chicago Title’s counsel is requesting an extension until June 17, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
6. Chicago Title requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in U.S. Bank’s motions;
7. U.S. Bank does not oppose the requested extension;
8. This is the first request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand [ECF No. 6] and Motion for Costs and Fees [ECF No. 7] is hereby extended through
3 and including June 17, 2021.

4
5 Dated: May 14, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: May 14, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

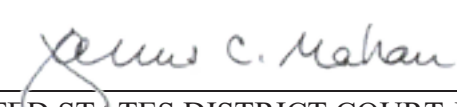
14 Dated: May 14, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins
16 LINDSAY D. ROBBINS
17 Attorneys for Plaintiff U.S. BANK
NATIONAL ASSOCIATION

18 **IT IS SO ORDERED:**

19
20 May 14, 2021
21 Dated: _____

By: 
UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

